PENNSYLVANIA

PLAN: LIFE PAID UP AT 95

BY RICHARD ANTONINO

CLASSIFICATION PREFERRED NONSMOKER

AGE SEX 24 FEMALE AMOUNT OF INSURANCE \$230,317

BASIC POLICY DISABILITY WAIVER TOTAL ANNUAL PREMIUM

0

 $\tilde{}$

ANNUAL PREMIUM YRS PAYABLE \$1,991.63 71 \$40.37 41 \$2,000.00

ACCELERATED PAYMENT PLAN TELESTRATION ANNUAL DIVIDENDS USED TO BUY PAID UP ADDITIONAL ENSURANCE

				1. L.	the forms the property	TRCE
END OF	ANNUAL		ILLUSTRATIV	・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・・	\ 	
POLICY	CASH OUTLAY	ANNUAL	CASH VALUE		LI IL	LUSTRATIVE
YEAR	FOR YEAR**	DIVIDEND		COMPUTEED	LLUSTRATIVE	DEATH
1 DATE	FOR IEAR"-	DIAIDEND	OF ADD. INS	CASH VALUE	CASH VALUE4	BENEFIT##
•	2 000		\	111.	•	
į	2,000	HONE	NONE \	/ NONE	NONE	230,317
. 2	2,000	895	↑ 895	/ NORE	895	239,926
3	2,000	944	/ 1,915	3 90	2,145	250,018
4	2,000	1,015	√ 3, 89 3	460	3,553	260,809
5	2,000	1,084	1 A 430	1,612	6,051	272,263
6	2,000	1,156	5 077	2,763	8,736	204 203
7	2,000	1,176	7 846 7	3.915		284,387
8	NONE	1,202	7 320	6,380	11,571	296,732
9	HONE	1232	2 032		12,637	291,311
10	HONE	259	1,021	& AD32	13,706	286,253
11	NONE		6,715	A 30 51	14,776	281,519
		1,717] 6,435	4 /\\ 97443	15,878	277,311
12	NONE.	X 3X4	6,188 <	11,055	17,243	273,603
13	NO	1/43/	5,978	12,667	18,647	270,386
14	RONE	\1, \ 9 <i>7\</i>	5,8330	14,279	20,093	267,650
. 15	~ none	1,55%	5363h	16,122	21,819	265,387
16	MONE	1.632		17,734	23,375	263,615
17	NONE	11.704	~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~ ~	19,576	25,226	
18	NOKE \	1/1.778	5.730	21,649		262,310
19	MONY /	1 858 4	5,896		27,379	261,465
20_	// KONE)/) AED' [23,492	29,389	261,096
52	WONE !	2 014	6,154	25,565	31,719	261,171
70	11 /202	2,000	6,519	27,638	34,157	261,718
23/1	71 1200	2,119	7,001	29,710	36,711	262,720
23 //	- MONE	2,199+	7,608	32,014	39,622	264,162
24	NONE	2,293+	8,358	34,317	42,675	266,060
25	NONE	2,404+	9,278	36,620	45,898	268,468
26	NONE	2,524+	10,390	39,153	49,544	271,410
27	None	2,646+	11,712	41,687	53,400	274,879
28	NONE	2,773+	13,265	44,451	57,716	
29	HONE	2.911+	15,076	46,984		278,882
30	NONE	3,040+	17,157	40,30 1	62,061	283,446
31	NONE	3,176+		49,978	67,136	288,537
32	NONE		19,534	52,742	72,217	294,162
33		3,305+	22,225	55,736	77,962	300,295
34	HONE	3,427+	25.246	58,730	83,977	306,911
	NONE	3,533+	28,611	61,955	90,567	313,957
35	NONE	3,627+	32,339	65,410	97,749	321,400
				•		

M129779220087

PAGE 3

METROPOLITAN LIFE INSURANCE COMPANY

6/02/92

\$MetLife

- 77 -

PENNSYLVANIA

EPARED FOR

BY RICHARD ANTONINO

ACCELERATED PAYMENT PLAN ILLUSTRATION ANNUAL DIVIDENDS USED TO BUY PAID UP ADDITIONAL INSURANCE

				•		
END OF	ANNUAL		ILLUSTRATIVE		_	
POLICY	CASH OUTLAY	ANNUAL	CASH VALUE		3	LLUSTRATIVE
POLITICA .	FOR YEAR**			GONIGHTEED	. + 4-4-034/KATT	TE the same
YEAR	LOW TENK	DIVIDEND	OF ADD. INS.	CASH VALUE	CASH VALUE	
					7 / / /	BENEFIT !
36	NONE	3,728+	36,463	68,864	106 100	
37	NONE	3,837+	41,016		105,327	329,261
	NONE			72,319	113,336	337,561
36		3,956+	46,040	76,004	122,045	346,331
3 9	NONE	4,095+	51,579	79,920	131,499	355,624
40	NONE	4,258+	57,680	83.645\\	11,285	355,024
,G€ 65	NONE	4,429+	64,388	87,520	141 000	365,504
42	NONE	4,608+	71,802	_ei.666	111,908	375,991
43	NONE	4,783+			443,408	387,227
			79,917	~\$5\\$81	A, 5, 499	399,094
44	HONE	4,956+	88,793	\ 9₹,9€7	//88,751	411,595
45	NONE	5,142+	98,500 \	100.100	202,604	424,767
46	NONE	5,334+	109,100	3 ha 3 7 a	217,580	
47	NONE	5,541+	120,653	(****/***	223 220	438,627
48	NONE	5.753+	132,022	X (2)	233,738	453,220
			173,205	12 (03)	250,897	468,567
49	NONE	5,985+	1/476 8 8 0	122,798	269,098	484,723
50	HONE	6,211+	161 /45)	126,674	288,126	501,697
51	NONE	6,432+	177,168	131,280	306,469	519,505
52	NONE	6,646+	194,038	135,887	120 025	443,303
53	NONE	6,849+	212,039		329,925	538,163
	NONE			140,263	352,302	557,679
AGE 7866		7,033+	231,239	144, 638,	375,078	578,055 599,316
55	NONE	Z 7\213+	^251,701	1,44,015	400,716	599.316
. 56	none	7, 102+	1 273,487	42(3,89)	426,878	621,505
57	none _	_ \ \ 6 N +	1296,636	357,767	454,403	
5.8	NOME	7.8494	321,200	01,912		644,688
59	NORE	/ /. X. /		N. 44 / 322	483,113	668,941
60	HONE	/ オポジン	347,192	166,058	513,250	694,341
		8, 395	374 (30)	169,973	544,604	720,953
61	NONE	\ 61,680+	4023639	173,889	577,427	748,830
62	/ NONE \	9,961+	457 963	177,344	611,307	778,015
63	ANONE	235+	C 55:963	181,029		
54	NONE	9,495+	799,629		646,992	808,549
65 _	WOME)		733,023	184,253	683,882	840,469
- :		9,756	35,090	187,708	722,798	873,825
5,6	/ // Nove	10,000+	572,511	190,932	763,444	908,656
63/1	1 your	10,182	612,028	194,157	806,185	944,935
68 //	NONE	10,364+	653,935	197,611	851,547	982,719
69	HONE	10,578+	698,601	201,297	899,898	302,113
70	NONE	10.562+	746,277			1,022,094
• •	anone.	10,5027	170,211	205,442	951,720	1,062,853
)/			,		

M129779220088

PAGE 4

METROPOLITAN LIFE INSURANCE COMPANY

6/02/92

\$MetLife

- 78 -

M537'

7 3

PENNSYLVANIA

EPARED FOR

 \bigcirc

BY RICHARD ANTONINO

210,049

ACCELERATED PAYMENT PLAN ILLUSTRATION ANNUAL DIVIDENDS USED TO BUY PAID UP ADDITIONAL INSURANCE

END OF ANNUAL ILLUSTRATIVE POLICY CASH OUTLAY LAUNNAL GUARANTEED ILLUSTRATIVE CASH VALUE ILLUSTRATIVE FOR YEAR ** YEAR DIVIDEND OF ADD. INS. CASH VALUE DEATH CASK VALUE BENEFITH NONE 10,239+ 797,043

THE CASH OUTLAY ILLUSTRATED SHOWS THE RESULTS IF THE CURRENT DIVIDEND SCALE CONTINUES WITHOUT CHANGE. DIVIDENDS ARE NOT GUARANTED AND MAX INCREASE OR THAT THE FUTURE. IF THE FUTURE DIVIDENDS DECREASE, IT 19 POSSIBLE FUTURE YEARS TO PAY THE FULL CURRENT PREMIUM AND SCHE CASH OUTLAY HAY BE REQUIRED. IF PREMIUMS ARE MODAL, ANNUALIZED PREMIUM FOUNDALS THE MODAL PREMIUM TIMES NUMBER OF PAY PERIODS FOR TAR.

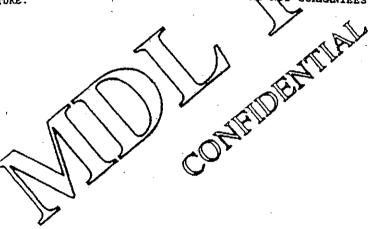
GUARANTEED CASH VALUE AND CASH VALUE OF INDIVIDUAL INSPRANCE.

16 BASIC INSURANCE AND ADDITIONAL INSURANCE

17 AGE AT LIFE EXPECTANCY - U.S. POPULATION LIFE TABLES.

ANNUAL DIVIDEND GREATER THAN ANNUAD PREMIUM,

DIVIDENDS BASED ON JAN. 1992 SCALE THAT USES CURRENT INTEREST, MORTALITY AND EXPENSE RATES. ILLUSTRATIVE FIGURES ARE NOT GUARANTEES OR ESTIMATES FOR THE



M129779220089

EXPLANATORY NOTES FORM 467 AND FORM 463-APP MUST BE ENCLOSED PAGE 5 METROPOLITAN LIFE INSURANCE COMPANY 6/02/92

₩MetLife

- 79 -

REDACTED CONFIDENTIAL POLICYHOLDER INFORMATION

RED FOR

PENNSYLVANIA

BY RICHARD ANTONING

ACCELERATED PAYMENT PLAN

for Payment of Future Premiums from the Cash Value of Paid-up Additional insurance or Accumulated Dividends with Interest

IMPORTANT NOTICE

wame of Insured

policy Number

plan of Insurance LIFE PAID UP AT 95

Abount of Ensurance

\$230,317

classification PREFERRED

Additional Benefits Included DISABIT

After premiums for your policy have been pair for 07 years, the Accelerated payment Plan allows you to choose to pay juture premiums as they fall due through the use of dividends, by withdrawing from the cash value of additional insurance or accumulates dividends with interest and mount which, together with the current dividend, will pay the current promium. When you wish to start this procedure, ask your Metropolitan Sales Representative to confirm that the dividends credited to your policy stather with dividends based on dividends are sufficient, the procedure sufficient this objective. If he paid annually ino object by you, the sales Representative will assist you in making this change if necessary and in putting this procedure in affect.

The number of years that premium payments in cash are required under the Accelerated Lyment Plan is best on the dividend scale in effect at the time the policy is send. Dividends, however, are not guaranteed. Changes in dividend states effect issue may increase or decrease the number of years shown also is future dividend scales decrease after this payment procedure is stated, it is possible that dividends may not be sufficient in some future years to pay the then full current premium.

The Acceptanted Payment Plan increases your flexibility. When dividends are sufficient, you may stop your cash outlay, or continue to pay your premiums as you normally do. Even if you have chosen to pay premiums by the Accelerated Payment Plan, you may return to paying your premiums as you previously did at any time.

Signatura:

_ Sales Representative:

M129779220090

FORM 468

HETROPOLITAN LIFE INSURANCE COMPANY

6/02/92

₿MetLife

- 80 -

STANDARD PRESENTATION LEDGER STATEHENT

FROMOSED FOR THE INSURANCE COMPANY ONE MADISON AUTHOR, NEW YORK, NEW YORK 100:0 \$230,317 Cafe at 95

femmle Age 24 Preferred Homsmoker Dividends Ruy Peid-Up Additions Amoul Folicy Freezes : 1 00.005.0 ATT CROSS ACE PRENIUM END OF TEAR TEVIDENO HET A/T BUTLAY CUR HET DUTLAY CASH CASH WLUE PLUSH NEW CHSHO LOAN INTERCET TOTAL LDAN UALUES LOAN 1,000 2,000 2,000 1,000 1,000 21 25 26 27 28 2,000 2,000 2,000 2,000 .000 .000 263 18**2** 2,000 2,000 2,000 2,000 2,000 2,000 1,225 1,423 1,435 1,452 1,467 SHEE 271,602 285,810 290,815 276,144 271,800 8,736 11,571 12,171 2,000 1,000 2,000 11 12 13 2,000 2,000 2,000 2,000 2,000 112,1 1,557 103,1 133,1 1,118 7,000 7,000 2,000 7,000 3,447 11,055 12,667 14,779 16,122 15,878 17,243 18,647 20,053 21,815 264,763 264,763 261,753 258,645 258,535 1,000 1,000 2,000 2,000 2,000 16 17 19 19 20 334041747 17.71 17.81 69.11 181.12 22.21 71,375 75,726 71,379 73,389 71,16 251,862 251,662 251,606 251,606 251,754 14.000 14,000 14,000 14,000 14,000 27 .676 29 .710 32 .014 34 .317 36 .620 2,000 2,000 2,000 2,000 2,000 15,000 14,000 14,000 14,000 14,000 19,153 11,687 14,151 14,151 18,131 19,378 49,54 53,400 51,716 62,061 61,136 261,053 266,490 270,441 274,933 279,576 7,000 2,000 2,000 2,000 2,000 2,000 2,000 1,000 2,000 2,000 3.797 14,000 14,000 14,000 14,000 14,000 53,712 55,736 51,730 51,335 11,55 120,57 172,08 172,08 4,024 4,256 4,486 4,718 2,000 2,000 2,000 2,000 2,000 4,577 5,249 5,555 5,629 6,288 36 37 38 E 40 7,000 7,000 2,000 2,000 2,000 14,000 14,000 14,000 14,000 14,000 68.064 72,315 76,004 79,515 63,665 155,327 133,336 122,045 131,439 141,235 129,083 129,083 137,086 141,131 157,053 Benefits included Saci-Annual Chack-O-Ratic Yrs. In Pay M129779220091 Same folicy Disability major 1,551.03 48.31 1,053.27 25.22 176.74 4.61 this illustration is not would unless accommend by the SUPPLEMENTAL FOOTHOLE PAGE

Inc ALBCATION OF UNLIES case shows the allocation of pressues, death Senefits and cash values between the base policy, term riger, if any, and the pass-so additions rider.

Fiamiliariable Gutlay(3) 06/12/1997

(*)

- 81 ~

Ontopared by:RICHARI ANIMANA ilatel

STANDARD PRESENTATION LEDGER STATEMENT

PROPOSED FOR METROPOLITAN LIFE INSURANCE CONTROL TO THE TRANSPORT OF THE TOTAL META TORK 10010 \$270,317 Life at 95

freterre Dividend	o No	nseck	er d-Up Addji t	icas			-				ARRUAT FOI	is referen	11 2,90
i	EEC OF YR	ATT ACE	AMEUAL SZOSS PREMIUM	OIVIDENC LIME OF	SURRENDER OF VALUES	NHEIK.	MANUAL LÜRK INTEREST	e⊊i azi ogilay	CUN NET SUFFLAT	ior Lagran	CASA VACE	Titust MET Englichen	SULETI EL BURTH ITTER
	41 47	ři	2,000			0	6	9	11,000	7			367,520
	43	65 E5	1.35.1 1.35.1	6,504 7,104	8,246 8,246	0	0	-6,295 -6,23				156,EM	361.239
	44	- 67	1.957	7.512	3,367	4,894	0	1,530	17,000		3924	151,612	361,507
	15	68	1,952	5.00	1,551	6,735	440	4.25	1,18	14,518 14,518	16,101	25,731	364,497 365,691
	45	E9 70	1,957	8,54£ 9,131	1,951	7,341	1.36	**************************************	-11.70 111.00 -11.00	76 250 25 25 25 25 25 25 25 25 25 25 25 25 25 2	109,479	923,171	373,497
	46	75	1,552	9.754	1,951 1,951	8.001 8,72;	4.00	3.20	20,110	1.59	111,085	183,707	371.55
	49	- 72	1,952	19.433	1,351	5.506	//507	1.30	-30.004 120.30	75.186	117,091 127,298	123,021	182,235
	SO	73	1,952	11,142	1,351	\$,506 10,362		\ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	-36.360 -17.655	ik.Z	125,574	200,063 120,003	385,606 390,722
	*****	74 75	1,357 1,357	11,884 12,658	1,\$51 1,\$51	11,794 17,31	5,000	70,23	7-18,35 0	149,33	131,280	208,226	294,601
	S	**	1.957	13.40	1,35(4,35)	13,419	£,01£		-55.74S -61,546	23/42 3/171	35,487	211,471	330,163
	ŠÃ	12	1.367	14.789	(1,33 1	14.526	7,124 8,332	# 75c	-01,540	12 TA	140,263	720,731	401.334
	55	79	1,357	15.15	351	15,540	1,648	1.75	41.15 200	23,138	144,639 145,015	225.771 271.027	163,990 160,300
	经记录记录	79 80	728, i 728, i	16,071	1.87	37.37)11,000 12,817 11,351	-6,295		140,514	153,321	235,928	407 ,372
	58.	61	1.80		/ /5!		13.41	- 1	720	153,455	257,767	240,373	107,920
	53	27		13.07	1:2	70	16,210		1 21 PL	[80,10]	161,512	344,401	407,594
	60	Ü	(1.93	25.00	1,20	X.55	11.79	(133	93.015 -95.310 -105.605	202 CO1 271 133	151,031	246,983 248,838	406 ,201 403 ,927
	紅	/*	7,952	21.TH	1.51	75,777	- A(1)	28.15 20.17			(73,889	-	400,305
	H.	a H	/ '2	71.00		29,143	_\(\sigma\)	-1,225	-111,195	283.013	177,344	244,787	195,205
	25.25	N	\ 22.2C	\% &	1.53	31.16	Z	-6.25 -6.25	124,490	314,77	281,023	246,156	393.886
\wedge	£2	//n			1.351		77.H	-6,295	-130 TES -137 000	349,403 387,144		242,690 207,115	380,214 365,795
18	et.	1/2	2.5	7 31.123 31.333	1,951 1,951 1,951	H, 140	34,843	-6,795	-143,375	123.281	: 90 . 972	229 427	355,672
11/2	ü	1	4.5		1.51	4,44	38,546 17,581	4 .35	-143,375 -148,570	120,281 173,121	. 90, 977 194, 157	223,41Z 213,532	241.371
11		1	1.55	31,577 73 77	1,551	91.876 272.272	17,581	-6.235	23£, 22±- '	521,537 575,271	137,611	207,789	322,894
//	18 183	1	1,35		1,53	56,969		4,23 -6,75 -7,75 -7,75 -7,75	722, 101-	53,731 633,340	201,237 275,442	191.936 (78,038	120, 200 120, 211
	2	7 <u>H</u>	1,951		1,551	63,796	57,001		•				
	77	32	4	37,115	. 0	68,992 75,201	62,698 68,907	-6,295	-181,145	765,627	710.049 713,734	133,802	245,153 210,947
	Wint.	55 55 57	9			15,201	68,507	-5,295 -6,295 -6,285	-197 440	840.826	17.549	113.04E	171,085
	-5	98		41.37		97.370 97.346		-t.Z55	-:93,735	922.792	22:.33	22,558	125,428
	-			******	•	43,396	83,652	-6.235	-:00,030	1,012,143	24.32	43,579	3,3,5

| Leating | Preside | Pres

M129779220092

This cilustration is not valid unless accompanied by the SUPPLEMENTAL FOOTHOR FACE.

1M9371

The MIDCATION OF UNLESS page shows the electron of pressure, death benefits and cash values between the base office, terminated, if any, and the parameter additions right,

Planipariable Buttav(): MT2/1997

~ 82 -

Eresured by ECCHARD ANICHING

₩MetLife

0

INDIVIDUAL RETIREMENT BENEFIT (I.R.B.)

V.A.

INDIVIDUAL RETIREMENT ACCOUNT (I.R.A.)
CERTIFICATE OF DEPOSIT (C.D.)

1. DISABILITY FEATURE+	IRB YES	IRA L	CIL
2. TAX-FREE WITHDRAWAL	Les 🔾	AND	No
3. COST OF LIVING ADJUSTMENT	Jes/) ₄₀	но
4. USE OF SAVINGS BEFORE AGE 59-1/2	Jes/	NO	NO
5. PENALTY FOR EARLY WITHDRAWAL		YES	YES
6. PREMATURE DEATH CLAUSE**	YES	NO	NO
7. TAX DEFERRED GROWTH	YES 🔨 ,	YES	NO.
8. 9 TO 124 LONG TERM RATE OF RETURN	Mar Ball	ио	NO
9. SELF-COMPLECING PROGRAM	Tres.	МО	NO
*YOUR LAUVAL INVESTMENT IS CONTEMED AS	LONG AS YO	U ARE DI	SABLED.
SHOULD DIE PREHIDURELY	NGS PROGRAM	FOR YOU	IF YOU
CONFUNED VE:			
YOU LIVE AND ACHIEVE YOUR GOAL B. YOU BECOME DISABLED C. YOU DIE PREMATURELY			

M129779220093

retropolition and ensurance foregoins statemented times and ensurance foregoing section and foregoing section and

м937:

Metropolitan Life

29

KETROPOLITAN INVESTMENT PROGRAM

WIDUAL RETIREMENT BENEFIT (I.R.B.)

- 1. SELF-COMPLETING PROGRAM:
 - A. SUPPLEMENTARY INCOME NEEDED AT RECIRCHENT
 - B. DISABILITY PROVISION TO GUARANTEE INVESTMENT
 - C. IMMEDIATE TAX-FREE INCOME IN THE EVENT OF PRE-
- 2. TAX-DEFERRED CACHTH
- 3. NO PENALTY FOR EARLY WITHDRAWAL
- 4. EMERGENCY SAVINGE PROGRAM
- 5. CON OF LIVING ADDITHENT BUXEN IN
- 6. FLEXIBILITY IN PREMIUM PARTERTS
- 7. PETION FOR EARLY MORIGANE LIQUIDATION
 - E. WACE OF MIND OF BESING WITH A STRONG COMPANY

M129779220094

Metroportan tire insurance Company - Metroportan Tower tide insurance Company - Metroportan Insurance and Annyan Corporator - Mettyle Securaes, inc. rective Chice - New York - Yes - Yes - Metroportan Property and Jedyn Insurance Company - mone Office - Manual - 8 ()

M937;

IX. RETIREMENT PLAN PROMOTIONS

3.53

Various marketing plans were developed and/or revised at both corporate and local levels, and were intended for use in soliciting the retirement market. The divertising used promoted retirement plans with heavy emphasis on "savings" and "deposits". The advertising made-little or no mention of life insurance, even though the sale objective was to sell life insurance. These marketing plans had the capacity to milled consumer into purchasing life insurance under the false presumption they were purchasing a retirement plan. It was also noted similar MetLife marketing practices and promotes were utilized in other states for the same surpose.

50(50 Plan: (see 199) 88 - 92)

marketing plan, with Tack book, allegedly developed at, and within, the Mittle Pittsburgh regional agency, by Michael J. George, Regional Training Director, was besigned to solicit the sale of Whole Life policies with Paid Up Addition Riders (PUAR) to Pennsylvania consumers. Portions of the track book, pre-approach letters, and telephone scripts presented the 50/50 Plan as an investment or savings vehicle rather than an insurance policy. The 50/50 Plan, as a marketing tool, was designed to allow targeting of any occupational group.

- 85 ~

A sample pre-approach letter from the 50/50 Plan track book (see page 88) described only savings and failed to mention insurance. A follow-up phone script from the 50/50 Plan track book (see page 88) referenced only a Metropolitan savings program when asking for an appointment.

. 3

The 50/50 Selling Points list (see page 90) from the 50/50 Plan track book failed to disclose that the solicitation was intended to propose insurance, and emphasizing "savings" and "retirement income" while pointing out that the prospective client could not "rely on Social Security" or their "employer." 150/50 Plan track book benefits page see page 911 the failed to disclose the solicitation as involving insurance.

The 50/50 Plan track book conduined standardized illustrations (see page 92) of the plan by sex and age, for conthly "deposits" (1)100.00, showing cash value and southly income generated at age 65. The illustrations reiled to disclose the solicitation as involving lagurance.

The plan was designed to identify an amount of "savings" by the consumer and then apply that amount as aqual premium payments into a Whole Life policy and a PUAR. Review indicates that the MetLife agent force, encouraged by some office managers, deviated from the

M129779220096

- 86 -

equal payment amounts and caused the entire amount to be paid into the Whole Life policy, with a PUAR for optional payments. The effect of this deviation was to provide increased commission earnings for MetLife agents and sales managers.

A benefite illustration page from the track book (see page 91) entitled "Metropolitan 50 50 a plan to provide for your personal savings" showed the plan as providing investment and savings aspects. No left nice was made to an insurance policy or payment of premiums.

No indication was found that MetLifectar formally approved use of the 50/30 Plan advertising, however, MetLife efficies Gary P Antonino and Charles M. Kavitsky were aware of the 90/50 Plan and red encouraged MetLife regional offices to use the 60/50 Plan advertising for tarketing purposes.

- 87 -

General

Dear

 $\mathcal{P}_{\mathcal{C}_{i}})$

 $: \cdot)$

Do you have a tendency to spend as much as like to start a savings plan that works? darus.

Host savings plans fail for one of the started or they lack discipline. they never get

Metropolitan has a savings plan that make great return, and is flexible for changing it easy to save, has a

It's Metropolitan's 50/50/plan

Regards,

CONFIDERVILLAND Mike George Account Bepres (412)

M129779220098

PHONE SCRIPT Follow-up -- Pre-Approach Letter

.)

Hello _____ This is _____ from Metropolitan, do you have a minute? I recently sent you a letter introducing metropolitan's new 50/50 savings program. If he in your area hext week and I would like to stop by and show you now it works.

The second of the s

M129779220099

- M9371

50/50 SELLING POINTS

- -- Savings
- -- Retirement income
- -- Discipline
- -- If you don't take care of your personal sakings who will?
- -- The first thing to do with a savenge started!
- -- Self-completion: disabili65
- -- Great return
- -- Tax deferral
- Simplicity

933

- -- Flexibility
- al security and your employer You can frely on Social Se

METROPOLITAN 50/50

a plan to provide for your personal savings

Our plan provides	S
Discipline	through regular systematic deposits from your checking account
Flexibility	You can make upscheduled payments at your own convenience.
Safety	Gasily Jues increase steadily as deposits are
Self Completion	in case of premature death or disability Metrop litan will complete the plan.
Tax Detectal	Increasing values in the plan are not subject to personal income tax until actually paid as cash or income to you. Deposits may be withdrawn tax free.
High Income	Metropolitan's life income payments are paid to you over your entire lifetime.
Simplicity	no investment or reinvestment worries either during the cash accumulation period or pay-out period.

M129779220101

:23

D

50/50 SAVINGS PLAN 50 Monthly Deposit 50.00 DEPOSITS MADE FOR 12 Cash Value at Age 65 250,648.00 Monthly Income 2,050.31 171,664.00 417,804.00 Income at Age 65 1,404.22 3,417.64 Death Benefit 58,749.00

MALE AGE 23

M129779220102

- 92 -

Nurses Insured Retirement Plan: (see pages 98 + 99)

A brochure (see page 98) promised tax deferred earnings, without clearly disclosing that the objectation was for a Whole Life insurance policy with an option to purchase paid-up additional insurance. The full amount paid for a "retirement plan" was actually used to fund a Whole Life policy.

Nurses Guaranteed Retirement Plan: (see pages 100 - 103)

A prospecting letter (see page 100) targeted nurses and offered a "retirement savings plan" without any disclosure of insurance. A variation of this solicitation (see page 101) was referred to the New Retirement Savings Plan, Now Wailable to III Mursing Professionals."

Health rolessions (Retirement Plan: (see page 102)

pre-approach letter (see page 102) was used in selicitation of a "Special Retirement Plan for Health Care Professionals." The solicitation did not mention the proposed sale of insurance. The letter did reference pravious solicitations of Pennsylvania consumers by a MetLife group in Tampa, Florida. Testimony by MetLife sales representatives obtained during the examination indicated the solicitation techniques of the Florida

- 93 -

M129779220103

49371

marketing group were adopted for Pennsylvania solicitation by MatLife sales representatives in Pennsylvania.

Small Business Employee Guaranteed Retirement
Savings Plan: (see page 103)

A prospecting letter targeting small business employees (see page 103) was found to obtain the from MetLife offices in Western Penhaylvania. This letter was of note since it failed to identify metLife directly and further reflects the wife variation of retirement/savings plan solicitations.

Met Life State Street Wealth
Accumulation Program: (see page 14)

Life policy, which had had sability waiver rider but no PWAR, depicted a marketing method used in obtaining the sale of a Whole life policy in combination with the purchase of a Methife State Street fund account (see page 104). The cover letter failed to disclose insurance as part of the program, while referring to the delivered policy as "Part A Insured Savings Summation," the policy's \$40.00 premium as "Monthly Investment," and the policy's death benefit as an "Immediate Estate Value." The Methife State Street portion of the plan was described as "Part B

M129779220104

Diversified Funds Summation," with a "Monthly Investment" of \$40.00. The "Total Monthly Investment" of \$80.00 promised a "Total Cash Accumulation at your age 65 of \$89,773.00" without disclosures as to the non-guaranteed aspect of the insurance policy's dividends.

This variation was of note, as it paralleled instances detected during examination of replacement issues where HetLife policyholders had been induced to surrender existing insurance into MetLife State Street fund accounts and then purchase new ansurance with lunds taken from the accounts in order to circumvent HetLife's replacement and rewritten business rules. These advertising materials all appeared to be examples of advertising which had not been approved by MetLife for use by the MetLife field force.

Tax Advantaged Bonus Prof. Tax Advantaged Retirement
Plan for Rurses, and Tax Advantaged Bonus Plan for
Rushess Owners: (see pages 105 - 154)

During the maximation MetLife provided copies of advertising for the above three (3) plans which had been approved by MetLife. The Insurance Department was subsequently informed by MetLife that these advertising pieces had inadvertently been made available to their field force upon approval by a marketing division of MetLife, without the usual required legal division

- 95 –

approval, and that only the Tax Advantaged Bonus Plan for Nurses had penetrated into the Pennsylvania marketplace. MetLife had allegedly recalled and destroyed all unapproved issues of the advertising. The Mexici corporate advertising was found consistent with ather questioned advertising, in that it proposed the sal whole life policies of insurance through splicitations promising earnings for retirement. While containing footnoted disclosure information, the various advertising pieces possessed a capacity, through stating precise earning values, to deserve consumers as to future earnings. Further, sales solicitation scripts employed by telemarketers clearly avoided the presentation of the Tax Advantaged Bonus Plan as insurance Pine Tax Advantaged Bonus Plan was found to have expliced from 1991 to 1993 backing of Mething Senior Vice President lauker and week In fact, termed alternatively Plan". confles H. Kavitsky, Territorial in Charge Vice President, Mideastern Story, was cound to have coordinated and provided telemarketing support to MatLife sales representatives J. Joel Sherman, Richard Antonino, and Ronald Schram in Western Pennsylvania for the Tax Advantaged Bonus Plan.

- FINDINGS AND CONCLUSIONS -

Although the examination could not identify in detail the full extent of market penetration gained by MetLife

- 96 -

M129779220106

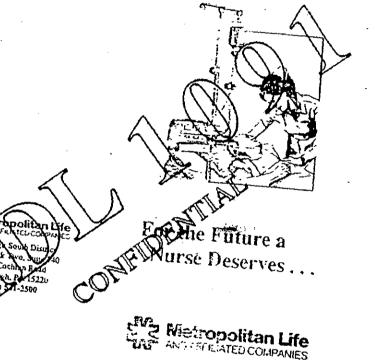
49371

- 97 -

M129779220107

W9371

NURSES INSURED RETIREMENT PLAN



M129779220108

98 -

M937;

Orders in MDL No. 1091 United States One Conference and Prosenting

 $\langle \cdot \rangle$

i characteristics conveniently.

pital, a computate in 142 for you du private part-time duty, bit i politan's Nurses In-, ed Rettreinent Paars, a caas, ment way far , to accuriodate case for the totule you

the new Insured returns to placeprovides 5 Libbath Length.

CONTROL

49

li you should leave your present nursing position, your retirement benefits can stay with you.

FLEXIBILITY

Access at thity of all

TAX BUNGERTS

far deterred accumulation while provide ing a life insurance benefit.

SECURITY

Can be used to provide lagrant income,

5 DISABILITY

Your manthly continued be deposited by formigolism should become displated

a mbanck; think about you

on call no it you to of toeon have to be prepared for

and his her a few memoras, think about your-All and what you'd like to be doing in the sature. Have you taken the time to make Sales.

At Meur politan Life, we can help you build a solul toundation of financial security with our Nurses Insured Reprendent Plan which car help you accumulate the money you need, taxdeterred for confrenensin years. If you we already at their saving, we can suggest ways to make your money work hander. There's sure to be a strategy that will fix one financial situation ioday wall consult yould a flexe bility for the years ahead

knowing that your burse injured Retirement ed by Metropolitan Life and aftilen a. a finagensi vervice vieader willi flici-i todacty and services have earned as see laguest ranness possible from

Jong 's Investor Service Au (For Fingachy) Mirengih)

Standard & Process
AAA (Po Chins-Paying Ability)

A.McHarl K Co.

Soundness of Investment)

With an ongoing commitment to quality. MetLife is building on a historic tradition of financial stability and security.

ivietropolitan Life AND AFFILIATED COMPANIES

M129779220109

M937;

Rogional Cti.ce

METROPOLITAN INSURANCE COMPANY 3 Parkway Center Cast 2020 Ardmore Boulevard Sulte 120 Pittsburgh, PA 15221

NURSES GUAPANTEED RETIREMENT SAVINGS PLAN

If you qualify, Matropolitan man a Guaranteed Retirement Savings Plan which is now available to ALL NURSES IN THE STATE OF PENNSYLAVANIA. This new Retirement Savings Plan is designed to complement your existing benefits with 5 VERY IMPORTANT FEATURES:

- -Unlike tradi Onal retirement plans, if you should leave your present nursing position, you will not lose your restrement benefits. 1. CONTROL 2. FLEXIBILITY -λva pen (ability of city without 3. TAX BENEFITS -High ltered growth.
- 4. SECURITY Rrovides a guaranteed lifetime income. 5. DISABILITY
- You monthly savings will continue to be deposited by Hetrapolitan should you become disabled. next lability ind quarantees make this NEW REMEMI SAVINGS PORMINE of the most widely investment world today. Would you mind form below in order that we may furnish you discossed in

rement Savings Plan.

0

 \bigcirc

v400 - 3

Basjan Zelenko Nursing Representative

NAME	
ADDRESS	CITY
STATE	CODE
HOME PHONE	PHONE
DAY DATE OF BIRTH: HONTH DAY	YEAR

M129779220110

Metropolitan Life'

- 100 -

₩ MetLife

168 West Chestnut Street Washington, Pa. 15301 Telephone: (412) 225-9090

NOW AVAILABLE TO ALL NURSING PROFESSIONALS

If you qualify, MetLife now has a savings plan available to all nurses. Would you mind giving us your name and date of birth below in order that we may furnish you information about a NEW RETIREMENT SAVINGS PLAN

- 1. High rate of return.
- The cash fund may be used for emergencies and opportunities.
- 3. Metropolitan makes deposits for you should you become disapled.
- 4. Pays a guaranceed income at retirement.

This is something new, one of the most widely discussed retirement programs in the investment world today.

Sincerell

Katen A. Danley

ccount epresentati

ر د کل

M129779220111

- 101 -

W9371

 \cdot

Metropolitan Life AND AFFLIATED COMPANIES

521 NORTHERN BLVD. CHINCHILLA, PA 18410 (717) 587-4731

SPECIAL	RETIREMENT	PLAN	FOR	HEALTH	CARE	PROFESSIONALS

Do you know the three greatest forces that will retirement and nest-egg? Interest rates, inflation, retirement and nest-egg? Interest rates, inflation, and taxes! MetLife has a Special Retirement Plan available to dercome these obsticles. Our marketing group in Tampa, Florida has provided you with information on Metlife's Plan that is NOW AVAILABLE LOCALIY!! For the benefit of local service and financial planning, please give your name and date of birth below in order that we may furnish you with information about MetLife's RETIREMENT SAVINGS TIAN:

- 1. High Rate of Return
- 2. Tax Deferred Growth
- 3. No Government Penalties

H you become disabled Pays Pays a CUARANTEED income at your retirement

deposits for

4. Complete Security of Principal AND Interest Move to another job

THIS IS SOUTHING NEW -- one of the most widely discussed retirement program in the investment world today! MetLife leads the industry in the quality of its investment portfolio, which makes are retirement accounts that of the most secure and profitable to be found:

Gordon ent Advisor

ADDRESS

STATE

SHORE SHORE

BUS . PHONE

DATE OF BIRTH

FOR MORE INFORMATION ON OTHER SPECIFIC PLANS, PLEASE CHECK:

- () MORTGAGE CANCELLATION PROTECTION :) DISABILLITY INCOME PROTECTION 'T' COLLEGE SAVINGS PLAN

() LIFE INSURANCE

- 102 ~

чэж д

Rue Ayes?

SHALL.	BUSINESS	EMPLOYEE	GUARANTEED	RETIREMENT	SAVINGS	PLAN
_			·			

IF YOU QUALIFY, we have a Guaranteed Retirement Savings Plan which is now available to ALL SNALL BUSINESS EMPLOYEES IN THE STATE OF PENNSYLVANIA. This new Retirement Savings Plan is designed to complement your existing benefit with 5 VERT IMPORTANT FEATURES:

1. CONTROL

:

- -Unlike traditional retirement planer if you should leave your present position, you will not lose your retirement benefits.
- 2. FLEXIBILITY
- -Availability of cash without
- 3. TAX BENEFITS
- -high tax sheltered growth.
- 4. SECURITY
- povides a quaranteed lifetime
- 5. DISKBYLIN
- -Your monthly savings will continue to be deposited by Michoel item should you become

The tax edvantages, availability and guarantees make this NEW GUARANTEED ACTIVENENT SAVINGS PLAN one of the most widely discussed in he investment world today. Would you mind completing his form belo in order that we may furnish you to the matter on this was netirement Savings Plan.

(Sinchrolly,

Retirement Plan Representative

~ 103 ~

M9371

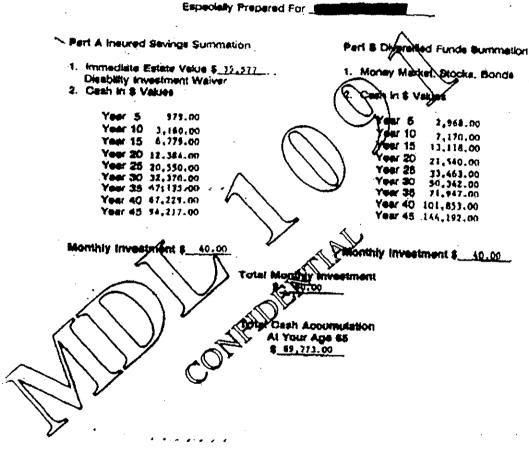
Nonce: Production and Use Subject to Case Measupenses and Protective Orders in MOL No. 1095. United States Drut, Ct."

(Mothe

(ت:

()

MET LIFE STATE STREET WEALTH ACCUMULATION PROGRAM A TWO PART SERIES



Part A Based on Current Dividend Sozies
Age 34 Standard Non-Smoker Class

Part B Based on a 10% Average Annual Return

Manuschine Life Ammoure Famolin, Marko und Euro I de Librard adapte Amerikanse das Amerikanse Merika Berkele Berkele Amerikanse das Amerikanse Merikanse das Amerikanses Amerikanses Amerikanses das Famoling Amerikanses in ein nageng

M129779220114

44371

TELEMARKETING SCRIPT USED FOR THE TAX-ADVANTAGED BONUS PLAN

Prepared by Ami M. Branman P.I. Advanced Markets

INTRODUCTION	٧	
--------------	---	--

Hello, may I please speak with Mr./Ms.---.

WHO'S CALLING?

This is — calling for MetLife. (is Mr./Ms.—available) (Am I speaking with Mr./Ms.—?)

WHAT'S THE CALL ABOUT?

I'm calling about a new retirement plan tailor designed for business owners. Could you please connect me to Mr. Ms.

PRESENTATION

Good (morning/afternoon), Mr./Ms.

My name is _____, and I'm contacting a celest group of small business dwhers to let them know about an exciting flew plan from metLife that the the business dollar to provide you with tax-free retirement income.

RARDY INTERRUPTION This plan involves no personal out-of-pocket expense or paperwook while providing you with a Tax Free retirement income. I promise III only take a moment of your time. (CONTINUE)

n a nutshell:

With IRS intruding on almost all forms of retirement plans, will there be any true Tax-Free Retirement income vehicles left for the small business owner?

What would you say if we could show you how to have tax-free retirement income with no out-of-pocket expenses to you?

M129779220115

it's one of the few plans that can be for yourself only or any employee or employees you choose, but it's not a requirement. You can begin and end the program for you or your employee(s) at any time.

And . . . if you should die prior to retirement, it would provide your loved ones with tax-free death benefits.

There's no drafting formal plan documents or IRS approval needed.

One of our specially trained account executive will be in your area and happy to stop by and fill you in on all the benefits - knowing how valuable your time is and this will only take 10 or 15 minute. May farrenge that for your

IF YES:

Terrific, Let me just confirm your address. I have it here as (READ ADDRESS), is this correct? Pancastic. A tep will call you shortly to confirm the time and dat Thank you and have a great day.

ANY QUESTIONS:

That's why I'd like to have a) pep. meet with you. They know the plan inside and out and can answers any and attackstions. They'll also be gladeto show you they to tailor the plan o your personal specifications. Again, know how valuable your time is and the meeting will be very brief, but the beginns for you can't be tremendous. Is (set appointment)

IF)

behalf of MetLife, thank you for your time.

ALREADY HAVE LIFE INSURANCE

This plan is tailored as a tax-free retirement income plan but does provide an outstanding tax-free death benefit should you pass away prior to retirement, its the best of both worlds. In addition it may be one of the last true tax-free retirement income vehicles. I would hate for you to miss this opportunity. May I have our Rep explain exactly how you can profit from the plan. Is (set appointment) good for you?

M129779220116

I ALREADY HAVE A RETIREMENT PLAN -

(1)

It's great to know that you're planning ahead. That's why you owe it to yourself to find out about this new plan- it has tax advantages that your current plan may not have, and it can give you a tax-free retirement income with no formal plan documents or personal out-of-pocket expenses. I'm sure you'll find it worth a few minutes of your time to let our Account Representative explain all the details. Is (set appointment) good for you?

GENERAL PLAN INFORMATION: - not part of scrip

- Unlike almost all other retirement/schefit plans, the owner of the business does not have to offer it to all employees it can be sued only for the owner, or for any employee or employees chosen by the owner.
- contributions to the plan are made using business dollars which are tax deductible.
- * On retirement, the participant will have a tax free income.
- * Tax-free death benefits are paid to supply of if the participant dies before retirement
- There is not meet to draft forms vian documents, there are no administrative fees, and there is no need to seek IRS approval.

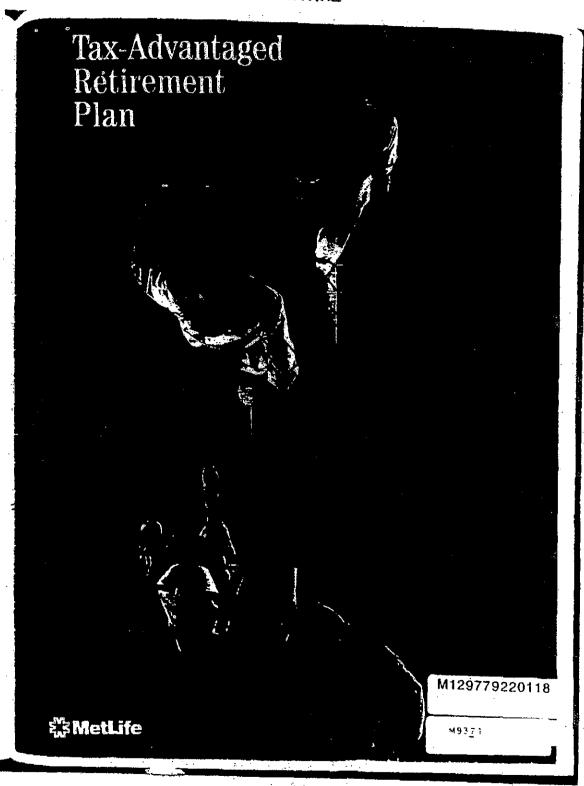
MetLift provides great denefits and retirement plans for 78 of the Forane 100 comments.

M129779220117

- 107 -

3

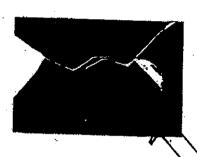
CONFIDENTIAL



Orders to MOL No. 1091 United States Oth. Ct.

Tax-Advantaged Retirement Plan

A new concept in retirement planning for you and your profession!



0

What if you as a nurse could reate upin our retirement plan —
inal allows you be contributed a much as a want and to provide yourself tax-free retirement benefits.

Recirculent with a Distinct Advantage

this is a retirement plan you can create for nurself. This is one plan that can give you nose important dollars for retirement and also make available cash for more impediate needs, such as family emergencies.

HANTAGES THAT BENEFIT YOU

tordanle - von decide now much you want to

Flexible - you plan how much you need and who

Portable --- you take the pian with you wherever your work takes you

 Uncomplicated — you pay no professional fees a. file no tax forms

stearity — you have retirement dollars you know will be there for you!

WHAT THIS PLAN CAN DO FOR YOU --IT CAN PROVIDE:

- · Tax-free rettrement benefits
- Tax-free survivor benefit for your family
- Tax-deferred cash values
- Contributions uninterrupted by disability with Waiver of Premium
- Cash reserve for personal or business needs

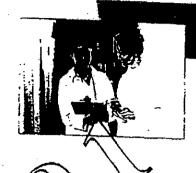


109

For Nurses

What contributing \$100 a month now can mean for your retirement later!

An Example (Female Age 35 Returing at 65)



FUI	NDING	PHASE
	. 7	·

i			<u> </u>
In Year	Guaranteed Cash Value	Cash Value	Survivor Benefit
5	\$4,009	2000	\$68,000
01	\$10,300	\$11,800	\$81,000
15	\$17,300	\$23,600	\$100,000
20	\$25,400	\$41,590	\$128,000
25	\$34,500	167600	\$164,000
30~	\$44,000	\$108,000	1010:000 ·~
	\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	4.7	•210,000 ·-

REPRESENT PHASE

	_
nnua Tax-free Benefit at 65	\$5,550
A STATE OF THE STA	
Total Benefit (p 8)	1 \$111,000
+ Ja-free Survivor Benefit Death at 85	1 \$208,000
Total Benefit	\$319,000
- Total Premiums	\$36,000
≠ Net Gain	\$283,000

The more you contribute, the greater your benefits!

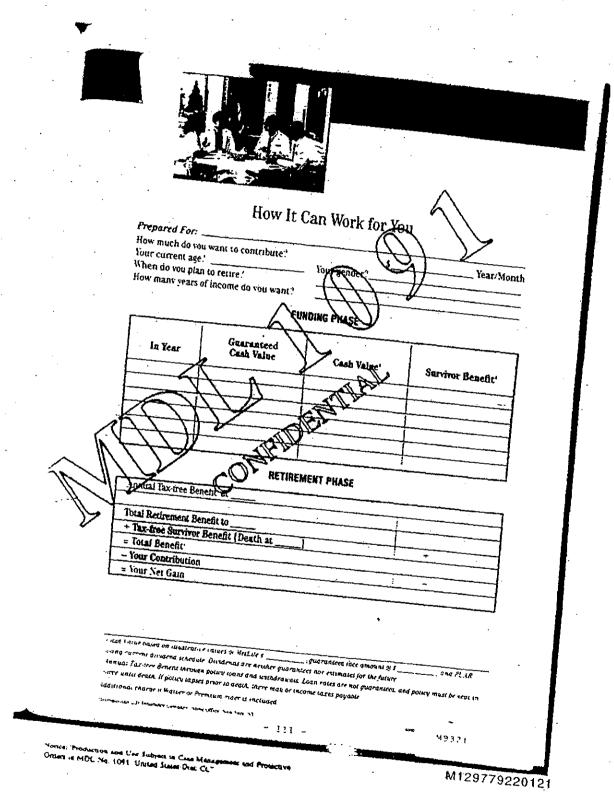
Monthly Premium		Annual Benefit Age 65	Total Benefit Ages 65–85		Survivor Benefit Age 85
\$150	;	\$9.300	\$186,000	÷	\$342,000
\$200	!	\$12,500	\$250,000	1	\$460,000

ash raine based in ituativative values of Mellife's Whole Life Hemail 35, quaranteed face amount of \$55.278; and PE LR sing 1883 streams screams. Dividends are neither quarantees nor estimates of the future

named Expires Benent through poticy sount and unlarguals. Loan rates are not quaranteed and policy must be kept in recome taxes payable

siditiona, name if Hauer it Premium rider is included.

<u>(i.j.</u>



CONFIDENTIAL

Tax-Mivantaged

Bonus Plan

Ticking Cure

of Number One



2

P.E. Marrier Was Metropology (1994) 1995 Maj Lase A

SMetLife

- 112 -

M9371

D

Taking Care of Number One! With a Tax-Advantaged Bonus Plan

bour number one employer restous tallity is to sour number one employee.

Įαu,

It's up to you to make sure that your business taken rare of you and your family.

Your beamess should provide you with petitement benefits and triancial securing that you describe for all your hard work.

leward council with a Tax-th amaged

À an emfloyee...

of II like a Tax-Advantaged Bonus Plan ecause it provides vou with retirement income, an emergency fund, and life insurance benefits at no out-of-pocket cost to bout

Às an employer...

You'll like a Tax-Advantaged Bonus Plan because it's a simple and flexible way to provide additional benefits to just one or a few key employees. There s no administration no IRS forms, and no headaches!

Talk to a MetLife representative about what a Tax-Advantaged Bonus Plan can do for you.

Do your business a favor by taking care of Number One!

CONFIDENTIAL

Tax-Advantaged Hamis Plan Sweet ite

manus. Production and the theory of the prior continue and Production and a Milk the Continue Continues.

M129779220124

Morror: "Production and Use Subject to Case Measupement and Prosecute Orders in MDL, No. 1091. United States Dist. Ct."

0

∰.

f:

Meanie Business Paining Selvices

How Does It Work?

It sample! The employee applies for a Methife insurance policy with the Paid-I p Additions Rider. The premium are paid from the Company checkbook and the Company gets a tax deduction for the premiums paid. The employee owns the policy and includes the premium as part of his or ner taxable income. However, the employee can comburse him or herself for the taxes baid from the cash value in the policy. This results in "\$0" nut-of-pocket cost to the employed

At retirement, the plan pays income to the employee's death, the plan pays a death benefit to the employee's beneficiaries. And In the retirement income and the death benefit are totally income tax-

ax deductible contributions Recruits and lettins your most Inployees

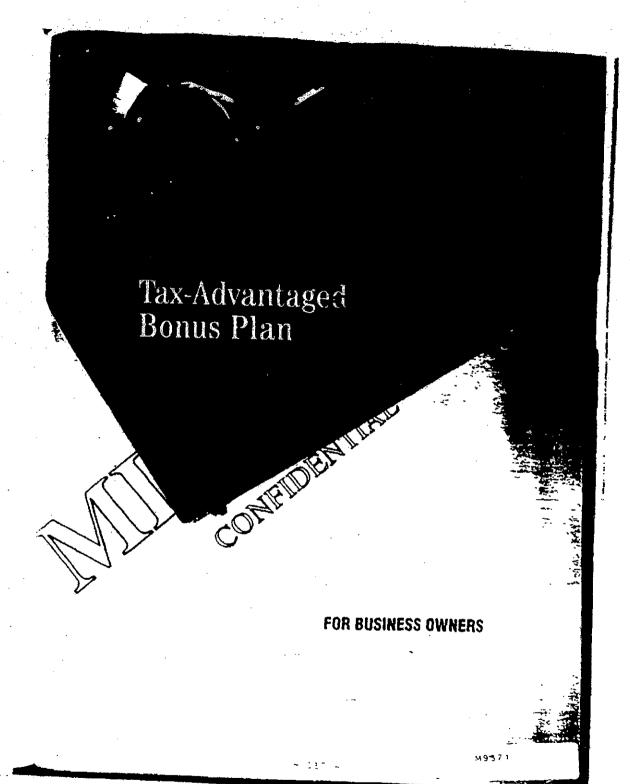
- No formal plan or documents
- No IRS approval
- No administrative costs
- No paperwork
- Plan can be discriminatory
- Total flexibility in changing or stopping bonus payment if any time

Employee Advantages:

- "\$0" out-of-pocket cost
- Life insurance protection
- · Retirement income
- · Cash values grow tax-deferred
- · Source of emergency funds
- · Disability income benefits
- · income tax-free death benefits

116 -

4937

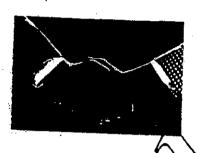


M129779220127

Nonce: Production and Use Subject to Case Management and Protective Orders in MOL No. 1081. United States Day Co."

Tax-Advantaged Bonus Plan

A new concept in retirement planning for you . . . the business owner!



D

Today you re in charge of your business—omeday you literant to be in charge of your retirement.

That is routed equid create justifier yourself; such that would ellow you've contribute as you've estimated and browness you work and wan to a deductible parties and wan to a deductible parties.

ABonus with a Distinct Advantage

This is one honus you can give courself and me one else! This is one plan that will give ou those most important dollars for extrement and also make available eash for more immediate needs, such as lamily emergences.

ADVANTAGES THAT REMEELT YOU -

Exclusive for you and you alone

Practice — design the plan the way you want it

Uncomplicated — save money on professional fe

Deductible — reduce your business taxes

WHAT THIS PLAN CAN DO FOR YOU

- Tax-free retirement benefits
- · Tax-free survivor benefit
- Tax-deferred cash values
- Contributions uninterrupted by disability with Waiver of Premium
- Cash reserve for personal or business needs
- Reimbursement for income taxes payable on bonus inplinal?



- 118